

- - Series of letters re proposed and revised consent orders in relation to North Brunswick, Piscataway and South Plainfield

15 pages

● CA000249L  
259



**NCDH**  
**National Committee**  
**Against Discrimination**  
**in Housing**

733 15th Street, N.W., Washington, D.C. 20005 (202) 783-8150

*Objections  
 coming from  
 Wolfson &  
 [unclear]*

*Held to 8-14*

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AUG 7 1984

JUDGE SERPENTELLI (202) 783-8150

August 3, 1984

CA000259L

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 LaDonna Harris  
 Dorothy I. Height  
 Norman Hill  
 Karla Irvine  
 Jay Janis  
 J. Bruce Llewellyn  
 Leon Lynch  
 Myrna Loy  
 Cyril Magnin  
 Melvin Mister  
 William O. Oliver  
 Lee Porter  
 William F. Rafsky  
 Marvin Rich  
 Dorothy Ridings  
 James S. Robinson  
 Patricia Rouse  
 Dr. Juliet Saltman  
 Henry Schecter  
 Althea Simmons  
 William Tisdale  
 Glegg Watson  
 Barbara Wurtzel

**EXECUTIVE DIRECTOR**  
 Martin E. Sloane

**GENERAL COUNSEL**  
 Bruce S. Gelber

Honorable Eugene D. Serpentelli, J.S.C.  
 Superior Court of New Jersey  
 Ocean County Court House  
 CN 2191  
 Toms River, New Jersey 08753

Re: Urban League of Greater New Brunswick, et. al. v. Borough of Carteret, et. al.

Dear Judge Serpentelli:

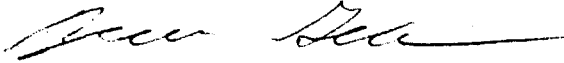
Enclosed is the revised proposed Consent Order as to North Brunswick Township which I am submitting under the five day rule. As I mentioned over the telephone today, in addition to the modifications discussed at the hearing two weeks ago, the revised Consent Order removes one of the two mobile home sites from the settlement, increases the density and acreage set aside for residential development on the Hamelsky (Hovnanian) and Johnson & Johnson (Reider) tracts, and provides for a single submission to Carla Lerman following the drafting of the revised ordinances.

Mr. Lefkowitz has advised me that he has already signed the proposed Consent Order on behalf of the township and is circulating that copy among the interested parties for their approval as to form and substance. I also have been advised by Mr. Hutt that he has no objection to entry of the Order. A copy of the proposed Order was also sent last Monday, Express Mail, to counsel for the non-party developers.

August 3, 1984  
Page Two

If you have any questions regarding the proposed Order, please feel free to contact me. Thank you for your consideration in this matter.

Sincerely,



Bruce S. Gelber  
General Counsel

BSG:vb

Enclosure

cc: Leslie Lefkowitz, Esq.  
Barbara Williams, Esq.  
Stewart Hutt, Esq.  
Douglas Wolfson, Esq.  
Fred Kessler, Esq.  
Robert Lecky, Esq.

**NCDH**  
**National Committee**  
**Against Discrimination**  
**in Housing**

733 15th Street, N.W., Washington, D.C. 20005 • (202) 783-8150

August 24, 1984

**PRESIDENT**  
Robert C. Weaver

**CHAIRMAN**  
Harold C. Fleming

**VICE PRESIDENTS**  
Sol Rabkin  
Ruth Robbins  
Kale A. Williams

**SECRETARY**  
Madison S. Jones

**TREASURER**  
Samuel J. Simmons

**ASSISTANT TREASURER**  
Martin E. Sloane

**DIRECTORS**  
Betty Adams  
Arnold Aronson  
Ben Barkin  
Joseph Battle  
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Philip Brownstein  
Herrington Bryce

Yvonne Braithwaite Burke  
Adrian De Wind, Esq.  
Charles T. Duncan  
Robert Embry, Jr.  
Christopher E. Edley  
Robert Raymond Elliott  
Dwight M. Ellis  
Margaret Fisher  
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Donald Harris  
LaDonna Harris  
Dorothy I. Height  
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Karla Irvine  
Jay Janis  
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Marvin Rich  
Dorothy Ridings  
James S. Robinson  
Patricia Rouse  
Dr. Juliet Saltman  
Henry Schechter  
Althea Simmons  
William Tisdale  
Glegg Watson  
Barbara Wurtzel

**EXECUTIVE DIRECTOR**  
Martin E. Sloane

**GENERAL COUNSEL**  
Bruce S. Gelber

Douglas K. Wolfson  
Greenbaum, Greenbaum, Rowe, Smith,  
Bergstein, Yohalen & Bruck  
Englehard Building  
P. O. Box 5600  
Woodbridge, New Jersey 07095

Re: Urban League of Greater New Brunswick, et. al. v. Borough of Carteret, et. al.

Dear Doug:

Enclosed is the original and one copy of the revised proposed Consent Decree regarding North Brunswick Township which contains the modifications to which counsel have agreed over the telephone. Please sign the original and circulate it to Stewart Hutt, Fred Kessler and Leslie Lefkowitz for their signatures. Les has agreed that, upon receipt of the signed proposed Order, he will submit it to the Court for its approval and entry.

Upon receipt of the signed Order from the Court, I suggest that we schedule a preliminary meeting with all interested parties to exchange views on the ordinance revisions required by the Order.

By copy of this letter, I am advising the Court of the status of our efforts to settle this

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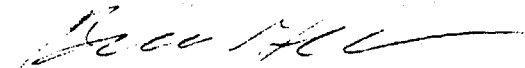
AUG 28 1984

JUDGE SERPENTELLI'S CHAMBERS

Letter to Douglas K. Wolfson  
August 24, 1984  
Page Two

case.

Sincerely,



Bruce S. Gelber  
General Counsel

BSG:vb

Enclosure

cc: Hon. Eugene D. Serpentelli, J.S.C.  
Barbara Williams, Esq.  
Stewart Hutt, Esq.  
Leslie Lefkowitz, Esq.  
Frederick Kessler, Esq.

*Held to 7-24*  
**RECEIVED**

JUL 17 1984

JUDGE SERPENTELLI'S CHAMBERS

TELEPHONE  
(201) 722-7555

*Iday*

**RAYMOND R. & ANN W. TROMBADORE**

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW

33 EAST HIGH STREET

SOMERVILLE, NEW JERSEY 08876

RAYMOND R. TROMBADORE

ANN WILKIN TROMBADORE  
OF COUNSEL

MARILYN RHYNE HERR

July 16, 1984

Honorable Eugene D. Serpentelli  
CN 2191  
Ocean County Court  
Toms River, New Jersey 08753

Re: Urban League of Greater New Brunswick  
v. Carteret, et al., Docket #C-4122-73  
Consolidated with  
Joseph Gerickont and George Gerickont  
v. Piscataway Township, Docket #L-32501-84 P.W.

Dear Judge Serpentelli:

I enclose a form of order. If you find the order to be in proper form and if other counsel do not object to its form or substance, please sign the order and return the additional copy to me after filing an original and one copy. I will then make sufficient copies of the order as filed and serve it on all other counsel.

Respectfully yours,

  
Raymond R. Trombadore

RRT/ljk

Enclosure

cc: All Counsel  
on attached list

Joseph Benedict, Esq.  
Benedict & Altman  
247 Livingston Avenue  
New Brunswick, NJ 08901

Bertram Busch, Esq.  
Busch & Busch  
99 Bayard Avenue  
New Brunswick, NJ 08903

Carl S. Bisgaier, Esq.  
Bisgaier & Pancotto  
510 Park Blvd.  
Cherry Hill, NJ 08034

Roger S. Clapp, Esq.  
Clapp & Eisenberg  
80 Park Plaza  
Newark, NJ 07102

Patrick Diegman, Jr., Esq.  
1308 Durham Avenue  
South Plainfield, NJ 07080

Thomas Farino, Jr., Esq.  
Applegarth & Halfacre Road  
Cranbury, NJ 08512

Bruce Gelber, Esq.  
National Comm. Against Dis.  
in Housing  
1425 H St., NW, Suite 410  
Washington, D.C. 20005

Michael J. Herbert, Esq.  
Stern, Herbert & Weinroth  
P.O. Box 1298  
Trenton, NJ 08607

Leslie Lefkowitz, Esq.  
1500 Finnegaus Lane  
P.O. Box 3049  
North Brunswick, NJ 08902

William C. Moran, Jr., Esq.  
Huff, Moran & Bolint  
Cranbury-South River Road  
Cranbury, NJ 08512

Eric Neisser, Esq.  
Rutgers Law School  
15 Washington Street  
Newark, NJ 07102

Michael Noto, Esq.  
151 Route #516  
P.O. Box 607  
Old Bridge, NJ 08857

Lawrence B. Litwin, Esq.  
Scerbo, Kobin, Litwin & Wolff  
Park Square Bldg.  
Morristown, NJ 07960

Philip Paley, Esq.  
Kirstein, Friedman, & Cherin  
17 Academy Street  
Newark, NJ 07102

Richard Schatzman, Esq.  
McCathy & Schatzman  
6 Charlton, Box 2329  
Princeton, NJ 08540

Joseph Stonaker, Esq.  
Stonaker & Stonaker  
41 Leigh Street  
Princeton, NJ 08540

Ronald Berman, Esq.  
Warren, Goldbert & Berman  
P.O. Box 645  
Princeton, NJ 08540

John M. Payne, Esq.  
Constitutional Litigation  
Clinic  
15 Washington Street  
Newark, NJ 07102

Guliet D. Kirsch, Esq.  
Brener, Wallack & Hill  
204 Chambers Street  
Princeton, NJ 08540

Stewart M. Hutt, Esq.  
Hutt, Berkow, Hollander &  
Jankowski  
Box 648  
Woodbridge, NJ 07095

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Hand - 8/1

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July 25, 1984

Honorable Eugene D. Serpentelli  
Judge, Superior Court of New Jersey  
Ocean County Court House, CN 2191  
Toms River, New Jersey 08754

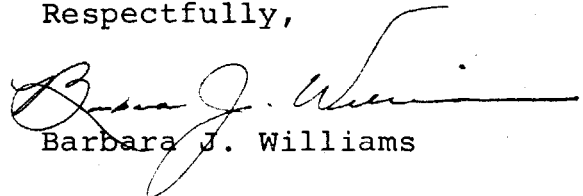
Re: Urban League, et al. vs. Twp. of Piscataway, et al.

Dear Judge Serpentelli:

I am enclosing the original and one copy of a proposed Order relating to the Motion of the Township of Piscataway which was heard by your Honor on July 19, 1984. If the proposed Order meets with your Honor's approval, I would appreciate a copy of the executed Order being returned to me in the self-addressed stamped envelope provided. Upon receipt of the executed Order, I will distribute copies to all counsel.

By a copy of this letter, I am advising all counsel that this proposed Order is being submitted to the Court pursuant to the Five Day Rule.

Respectfully,

  
Barbara J. Williams

encls

cc/All Counsel on  
annexed service list

RECEIVED

JUL 26 1984

JUDGE SERPENTELLI'S CHAMBERS



SERVICE LIST

Michael J. Herbert, Esquire  
STERNS, HERBERT AND WEINROTH, P.A.  
186 West State Street  
P.O. Box 1298  
Trenton, New Jersey 08607

William C. Moran, Esquire  
HUFF, MORAN AND BALINT  
Cranbury-South River Road  
Cranbury, New Jersey 08512

Joseph L. Stonaker, Esquire  
STONAKER AND STONAKER, ESQUIRES  
41 Leigh Avenue  
P.O. Box 570  
Princeton, New Jersey 08540

Richard Schatzman, Esquire  
McCARTHY AND SCHATZMAN, P.A.  
6 Charlton Street  
P.O. Box 2329  
Princeton, New Jersey 08540

Thomas R. Farino, Jr., Esquire  
Corner of Applegarth and Half Acre Roads  
Cranbury, New Jersey 08512

Carl S. Bisgaier, Esquire  
BISGAIER AND LOEFFLER  
510 Park Boulevard  
Cherry Hill, New Jersey 08034

Bertram Busch, Esquire  
BUSCH AND BUSCH, ESQUIRES  
99 Bayard Street  
P.O. Box 33  
New Brunswick, New Jersey 08903

Stewart M. Hutt, Esq.  
459 Amboy Avenue - Box 648  
Woodbridge, New Jersey 07095

Patrick J. Diegnan, E  
2325 Plainfield Avenue  
South Plainfield, N.J. 07080

Joseph Benedict, Esq.  
247 Livingston Avenue  
New Brunswick, N.J. 07080

Daniel S. Bernstein, Esq.  
Bernstein, Hoffman & Clark  
336 Park Avenue  
Scotch Plains, N.J. 07076

Lawrence B. Litwin, Esq.  
Scerbo, Kobin, Litwin & Wolff  
10 Park Place  
Morristown, N.J. 07960

Phillip Paley, Esq.  
Kirsten, Friedman & Cherin  
17 Academy Street  
Newark, N.J. 07102

Raymond R. Trombadore, Esq.  
Trombadore & Trombadore  
33 E. Main Street  
Somerville, N.J. 08876

Leslie Lefkowitz, Esq.  
1500 Finnegans Lane  
North Brunswick, N.J. 08902

Guliet D. Hirsch, Esq.  
Brener, Wallack & Hill  
2-4 Chambers Street  
Princeton, N.J. 08540

Michael Noto, Esq.  
151 Route 516  
Old Bridge, N.J. 08857

Arnold K. Mytelka, Esq.  
Clapp & Eisenberg  
80 Park Plaza  
Newark, N.J. 07102

William L. Warren, Esq.  
Warren, Goldberg, Berman & Lubitz  
112 Nassau Street  
Princeton, N.J. 08540

Ronald L. Shimanowitz, Esq.  
459 Amboy Avenue  
Woodbridge, N.J. 07095

10-29

STRAUSS, WILLS & O'NEILL

ATTORNEYS AT LAW

32 NASSAU STREET

P. O. BOX 1161

PRINCETON, NEW JERSEY 08542

(609) 924-0050

CABLE: NJLAW

TELEX: 220500VIDSP

TELECOPIER: (609) 924-0029

PRINCETON PROFESSIONAL PARK

601 EWING STREET

PRINCETON, NEW JERSEY 08540

320 SOUTH BROAD STREET

TRENTON, NEW JERSEY 08608

(609) 396-4997

ROBERT M. DIX  
OF COUNSEL

RIDLEY M. WHITAKER  
N. J. AND N. Y. BARS  
OF COUNSEL

GORDON C. STRAUSS

G. ROBERT WILLS  
N. J. AND N. Y. BARS

PETER M. O'NEILL  
N. J. AND CONN. BARS

FRANKLIN R. NASH

STEVEN A. STUPAK  
N. J. AND FLA. BARS

PATRICIA L. RATNER  
N. J. AND D. C. BARS

JEFFREY M. HALL  
N. J. AND CONN. BARS

PATRICIA SCOTT-BUZZI

KAREN L. CAYCI  
N. J. AND PA. BARS

October 19, 1984

Honorable Eugene D. Serpentelli  
Ocean County Court House  
CN 2191  
Toms River, NJ 08754

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OCT 22 1984

JUDGE SERPENTELLI'S CHAMBERS

Re: Urban League of Greater New Brunswick  
v. The Mayor and Council of Carteret, et al.  
Docket No. C-4122-73

Dear Judge Serpentelli:

In accordance with Your Honor's letter of October 2, 1984, I enclose the original and four (4) copies of a proposed form of Order for review and signature.

This Order is being submitted pursuant to the Five-Day Rule, with copies being served upon all parties of record by copy of this letter. Should any interested party object to the form or content of the Order, he should contact Your Honor within five (5) days of the date hereof.

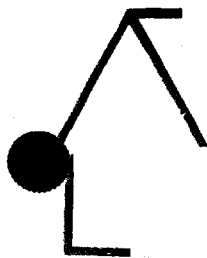
I also enclose a self-addressed, stamped envelope for the Court's convenience in returning the signed Order.

Respectfully submitted,

PETER M. O'NEILL

PMO'N:jar  
Enclosures

cc(w/enc.): All Counsel On Annexed List



**NCDH**  
**National Committee**  
**Against Discrimination**  
**in Housing**

733 15th Street, N.W., Washington, D.C. 20005 • (202) 783-8150

October 31, 1984

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 Samuel J. Simmons

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 Martin E. Sloane

**DIRECTORS**  
 Betty Adams  
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 Barbara Wurtzel

**EXECUTIVE DIRECTOR**  
 Martin E. Sloane

**GENERAL COUNSEL**  
 Bruce S. Gelber

Honorable Eugene D. Serpentelli, J.S.C.  
 Superior Court of New Jersey  
 Ocean County Court House  
 C.N. 2191  
 Toms River, New Jersey 08753

Re: Urban League of Greater New Brunswick v. Borough of Carteret (Piscataway Township - Reidhal, Inc. Application)

Dear Judge Serpentelli:

We have reviewed Ms. Lerman's analysis of the Park View, Section Two site in Piscataway Township, and have no major disagreement with her findings and conclusions.

In light of the unusual configuration of the site which limits the appropriate density, the existence of water and sewer lines and several foundations which were constructed some time ago to accommodate single-family development, and the limited number of Mt. Laurel units that could be built even if the site could be converted to multi-family use, we have no objection to vacating the temporary restraints with respect to this site, and hereby withdraw our motion as to this property. While any one of the above factors might not warrant this conclusion, taken together, they demonstrate that the site is not realistically suitable for a low and moderate income housing development.

For your convenience, I have enclosed a proposed Order vacating the temporary restraints regarding this site. Thank you for your

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NOV 5 1984

JUDGE SERPENTELLI'S CHAMBERS

*Handwritten signature/initials*

Letter to Hon. Eugene D. Serpentelli  
October 31, 1984  
Page Two

consideration in this matter.

Sincerely,



Bruce S. Gelber  
General Counsel

BSG:vb

cc: Philip Paley, Esq.  
Howard Gran, Esq.  
Chris Nelson, Esq.  
Barbara Williams, Esq.  
Carla L. Lerman, P.P.  
Alan Mallach

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November 27, 1984

The Honorable Eugene D. Serpentelli  
Judge, Superior Court  
Ocean County Court House  
Toms River, New Jersey 08753

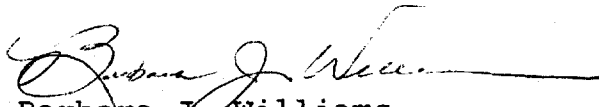
Re: Urban League v. Carteret, # C 4122-73

Dear Judge Serpentelli:

I am enclosing the original and one copy of a proposed Order in relation to South Plainfield. If the proposed Order meets with Your Honor's approval, I would appreciate an executed copy of the Order being returned to me in the self-addressed envelope provided.

By a copy of this letter, I am advising opposing counsel that the Order is being submitted pursuant to the Five Day Rule.

Respectfully,

  
Barbara J. Williams  
Attorney for Plaintiffs

encls

cc/Patrick Diegnan, Jr., Esq.  
Angelo H. Dalto, Esq.  
William V. Lane, Esq.  
Peter J. Calderone, Esq.

BERNSTEIN, HOFFMAN & CLARK  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW

5 day 11:49 to  
12-31  
DEC 24 1984

HARRY E. BERNSTEIN  
DANIEL S. BERNSTEIN  
BARRY M. HOFFMAN  
ROWAND H. CLARK  
CERTIFIED CIVIL TRIAL ATTORNEY

FRANKLIN STATE BANK BUILDING  
336 PARK AVENUE  
SCOTCH PLAINS, N. J. 07076  
201-322-2300

December 20, 1984

Honorable Eugene D. Serpentelli  
Superior Court of New Jersey  
Ocean County Court House  
Toms River, New Jersey 08753

RE: Urban League vs. Carteret, et al  
Docket No. C 4122-73

Dear Judge Serpentelli:

Bruce S. Gelber, Esq. has advised me that the Urban League is withdrawing its objection to the development of the property which is owned by Corporate Park 287.

I would request that the Court sign the enclosed order under the five day rule.

Respectfully yours,

*Daniel S. Bernstein*  
mb

Daniel S. Bernstein

DSB:mb  
Enclosure  
CC: Attorney list attached

Phillip Paley, Esq.  
Kirsten, Friedman & Cherin  
17 Academy Street  
Newark, NJ 07102

Michelle Donato, Esq.  
Frizell & Pozycki  
P.O. Box 247  
Metuchen, NJ 08840

Chris A. Nelson, Esq.  
Venezia & Nolan  
306 Main Street  
Woodbridge, NJ 08095

Raymond R. Trombadore, Esq.  
Trombadore & Trombadore  
33 E. Main Street  
Somerville, NJ 08876

Glen S. Pantel, Esq.  
Shanley & Fisher  
95 Madison Avenue  
Morristown, NJ 07960

Lawrence A. Vastola, Esq.  
Vogel, Vastola & Gast  
10 Johnston Drive  
Watchung, NJ 07060

Guilet D. Hirsch, Esq.  
Brener, Wallack & Hill  
2-4 Chambers Street  
Princeton, NJ 08540

Angelo H. Dalto, Esq.  
Abrams, Dalto, Gran, Hendricks  
& Reina  
1550 Park Avenue  
South Plainfield, NJ 07080

Donald R. Daines, Esq.  
K. Hovnanian Companies of New Jersey  
10 Highway 35, P.O. Box 500  
Red Bank, New Jersey 07701

Jack Dusinberry, Esq.  
Barry Mandelbaum, Esq.  
141 South Harrison Street  
East Orange, NJ 07018

Howard Gran, Esq.  
Abrams, Dalto, Gran,  
Hendricks & Reina  
1550 Park Avenue  
South Plainfield, NJ 07080

Edwin Kunzman, Esq.  
Kunzman, Kunzman & Yoskin  
15 Mountain Blvd.  
Warren, NJ 07060

Lawrence B. Litwin, Esq.  
Scerbo, Kobin, Litwin & Wolff  
10 Park Place  
Morristown, NJ 07960